

CERTIFICATE OF SERVICE

I, JESUS RAMIREZ, certify that on the 19th day of June, 2015, a true and correct copy of the foregoing, **PLAINTIFF PHARR SAN JUAN ALAMO INDEPENDENT SCHOOL DISTRICT'S EXPERT DESIGNATION** was mailed on the following counsel of record:

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7845

And Email: dbenjamin@benlawsa.com

David P. Benjamin
BENJAMIN, VANA, MARTINEZ & BIGGS, LLP
2161 NW Military Highway, Suite 111
San Antonio, Texas 78213

Via Certified Mail,

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And Email: mbc@aaplalaw.com

Matthew B. Cano
Sara Whittington May
ALLENSWORTH AND PORTER, L.L.P.
100 Congress Avenue, Suite 700
Austin, Texas 78701

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7869

And Email: sedwards@hudgins-law.com

Spencer Edwards
THE HUDGINS LAW FIRM
A PROFESSIONAL CORPORATION
24 Greenway Plaza, Suite 2000
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JESUS RAMIREZ

Agustin J Rodriguez

316 W. Nyssa

McAllen, Texas 78501

E-mail: bluesunstudio@yahoo.com

956.451.7272 mobile

SUMMARY: Have managed design projects from inception thru construction administration for design offices. Launched, managed, and marketed Rio Grande Valley architecture satellite office for over four years for PGA Architects. Developed a project management handbook, a company website, and an office practice standards manual for PGa corporate office and ROFA Architects. Have extensive knowledge of building codes, governing agency regulations, hospital licensing standard and construction. Skilled at building effective, productive working relationships with clients and staff and have excellent analytical, organizational, and creative skills.

EDUCATION:

The University of Texas at Austin

Bachelor of Architecture

Dec. 1996

Honors and Activities:

Mebane Scholarship Recipient

Slab Student Publication

Furniture Design Scholarship Award

EMPLOYMENT:

PSJA ISD

Pharr Texas

July 2011- present

District Project manager coordinating design and construction teams. Established building programs, staff coordination requirements, schematic designs, and coordination with design team for implementation. Held pre bid and bid conferences with design and construction team. Establish district building and material standards, created a construction filing systems and generated AIA contracts. Head the contractor and design team ranking committees. Head facility board workshops and made board project update presentations. Work closely with other district teams for in house projects. Assist attorneys with drafting architect, engineer and other design professionals contracts; participate in all phases of procurement of design professional and contractor construction contracts; assist with evaluation of design-phase submittals by architects and engineers; review cost estimates by architects; assist with negotiations of terms construction contracts; change orders, requests for information and coordinate and supervise Owner's construction phase project construction staff; coordinate and document Owner's substantial completion, final completion and post-completion due diligence.

ROFA, Inc. Architects

McAllen, Texas

September-2005-July 2011

Head designer for ROFA, Inc. McAllen for over 6 years designing Schools, Commercial, Governmental, and Healthcare Projects. Master Plan, Architecture, Interiors, and building systems. Coordinated staff requirements to establish building programs and coordinated design teams.

Polkinghorne Group Architects, Inc.

Austin, Texas

September-1994-September 2005

Junior Partner of PGa-Austin with over 10 years of experience in the architecture field. Participated as Project Manager and design lead on a variety of healthcare, commercial, educational, religious and interior projects.

Cornerstone Group Architects

Austin, Texas

May 1994-August 1994

Design lead and drafting support with premiere high end residential design/build firm in Central Texas. Developed presentation, schematics, concept drawings and coordinated construction documentation with consultants while attending undergraduate studies at the University of Texas at Austin.

Dick Clark Architecture
Austin, Texas

March 1994-May 1994

Developed concept and presentation models for an International award winning firm while attending undergraduate studies at the University of Texas at Austin. Projects include single-family and multifamily residential projects, resorts and custom homes throughout the United States and the Caribbean. The firm is a leader in hospitality design of some of Texas' most successful restaurants and golf course amenities.

SKILLS AND ACCOMPLISHMENTS:

Design Projects:

Managed, selected, and directed design and consultant teams for numerous large and small design projects around the United States. Coordinated bid and construction documents from design development to construction administration.

PSJA ISD *District Project Manager coordinating Education facilities with design and construction teams.*

Selected Project List:

*Audie Murphy Middle School: Gignac Architects
Southwest High School: ROFA Architects
Thomas Jefferson Early College Campus: ERO Architects
Aida Escobar Elementary School: EGV Architects
Ford Elementary School: ROFA Architects
Farias Elementary School: ROFA Architects
Escalante Middle School: Gignac Architects
McKeever Elementary School: ROFA Architects
Arnold Elementary School: Vittetta Architects
PSJA ISD Stadium Renovations: ROFA Architects
Austin Middle School: Gignac Architects
LBJ Middle School: EGV Architects
North High School Renovations: ERO Architects
Alamo Middle School Renovations: Gignac Architects
Sorensen Elementary School: ERO Architects
Marcia Garza Elementary School: ERO Architects
Ramirez Elementary School: Milnet Architects
Longoria Elementary School: Gignac Architects
Science Additions: ERO Architects
Science Additions: ROFA Architects
Farias Elementary School: ROFA Architects*

ROFA, Inc. Architects:

Head designer coordinating design teams and projects. Multi disciplinary function as office coordinator and project manager.

Selected Project List:

*Hidalgo County Offices at the formerly know as the Kmart Building - Edingburg, TX
Market Center Commercial Development - McAllen, Texas
Trevino Shopping Center - Pharr, TX
McAllen War Memorial - McAllen, TX
La Piedad Cemetery Monument - McAllen, TX
Valley View Independent School District - Pharr, Texas
PSJA Independent School District - Pharr, Texas
Falfurrias Medical Plaza - Falfurrias, Texas*

Polkinghorn Group Architects, Inc.:

Developed Marketing strategy and targeted client base for Polkinghorn Group Architects, Inc. Valley office. Established contracts on several healthcare, religious, and residential projects and developed programming for healthcare campuses.

Selected Project List:

*Physician's Hospital of Mercedes - Mercedes, TX
Brownsville Imaging Center - Brownsville, TX
St. Peter & St. Paul Episcopal Church Master Plan - Mission, TX
National Specialty Hospital of El Paso Addition and Renovation - El Paso, TX
Sunset Canyon Veterinary Clinic - Dripping Springs, TX
DeTar Hospital Renovation - Victoria, TX
Bay Area Surgical Center - Webster, TX
National Specialty Hospital of San Antonio - San Antonio, TX
Coleman County Medical Center - Coleman, TX
Butler County Surgery Center - Hamilton, OH
North Central Baptist Surgery Center - San Antonio, TX
VA Medical Center - Temple, TX
Park Place Surgery Center - Lafayette, LA
Surgicare of Lake Charles - Lake Charles, LA
Podio Residence - Austin, TX
Clark Residence - Dripping Springs, TX
Dripping Springs Community Library - Dripping Springs, TX
St. Martin de Porres, Dripping Springs, TX
Round Rock Surgery Center - Round Rock, TX
South Austin Health Clinic Addition & Renovation - Austin, TX*

Community/Association Involvement:

*American Institute of Architects: 1997-present
Texas Society of Architects: 1997-present
Intern Associate Director 2001-2003
LRGV-AIA Design Awards Committee Chair: 2002-present
BCC Marketing Committee Secretary/Chair 2003-2004
LRGV-AIA Executive Committee Member 2002-2004
Proyecto Azteca: Volunteer - 2004
FAIA Portfolio Delgn: "Tom Ashley, FAIA": 2002
AIA-Austin Homes Tour Committee: 1997-2000*

Technical:

*Proficient in Autodesk AutoCAD, Adobe PhotoShop, Microsoft Publisher, Adobe PageMaker, Sketch-up, and Windows based programs and software.
Free hand concept drawings, models, and renderings*

AWARDS AND RECOGNITION:

*Community Outreach Award: Aids Services of Austin - 1999
AIA-Austin: Young Architectural Professional Award Nominee - 1999
Semi-Annual Pulse Innovative Design Contest: Honorable Mention - 2000
Veterinary Economics Hospital: Design Merit Award - 2002
LRGV-AIA: Presidential Award - 2002*

AMSTAR ENGINEERING, INC.
Structural/Civil Consultants
707 River Road
Austin, Texas 78734
(512) 263-3661
Fax (512) 607-6641

Registered Professional Engineers
Texas Oklahoma Arizona
Louisiana Georgia Colorado
Mississippi Utah North Carolina
Kentucky Alabama Arkansas
Texas Firm F-1975

THOMAS JUNE MELTON, III
Licensed Professional Engineer
October 19, 2013

STATES OF REGISTRATION:

Texas
Georgia
Mississippi
Oklahoma
Arizona
Colorado
Utah
Louisiana
North Carolina
Kentucky
Alabama
Arkansas

STATE DISCIPLINES

Structural Engineering
Civil Engineering
Architectural Engineering – Structural, Civil, Building Design, HVAC, Plumbing Engineering

FEDERAL CERTIFICATION

Department of Defense Nuclear Fallout Shelter Analyst 511-1609-68

EDUCATION:

New Mexico Military Institute 9/58-5/60 HS Diploma 5/60
University of Texas, Austin 9/60-1/65 BS ARE 1/65
University of Texas, Austin 1/65-8/66 MS ARE 8/66

EMPLOYMENT HISTORY:

10/88 to present - President, Amstar Engineering, Inc.; Austin, Texas. CEO of architectural/structural/civil engineering design firm engaged in commercial, industrial and residential building and site design, general consulting, inspections, and forensic analysis and determinations for owners, architects, engineers, contractors and property managers.

8/85 - 10/88 - Travis Associates, Consulting Engineers, Austin, Texas; Structural and civil engineering project design engineer. Projects included structural design of office buildings, apartments, sewage treatment plants and courthouse modifications. Structural investigative and repair analysis included apartments, houses, office buildings and government facility. Civil engineering design included roads, drainage, wastewater collection and disposal facilities for various developments.

9/84 - 8/85 - Capital Erectors, Austin, Texas; Vice president and CEO of newly-formed steel erection company. Duties included structural analysis of complex steel erection procedures.

general administration, contract negotiation, personnel control, field coordination, inspection and safety evaluations.

11/82 - 3/84 - DalMac Development Company, Dallas, Texas; Vice President and CEO of DalMac Residential Development Corporation in charge of acquiring developable land for apartment and condominium projects in the Dallas area. Responsibilities included general administration, contract negotiation, civil engineering analysis of proposed land acquisitions, and structural engineering evaluation of existing apartments and condominiums proposed for acquisition.

9/75 - 9/84 - President; T. J. Melton, III & Associates, Inc., Midland, Texas, a civil/structural build/design firm. Structural engineering projects included Westgate Business Park (offices and warehouses), medical facilities, oilfield structures, insurance offices, retail centers, hotels, schools, churches and large residences. Civil engineering projects included Westgate Acres roads, utilities and drainage, and a large water-recreation park. Company closed in 1984 due to overall decline in oil-related Texas economy. Worked full time from 9/75 to 11/82; part-time from 11/82 to 3/84, and full time from 3/84 to 9/84.

9/73 - 9/75 - Project engineer; Bryant-Curlington, Consulting Engineers; Austin, TX; Project design engineer for expansion to Davis Water Treatment Plant; preliminary studies of Onion Creek Sewage Treatment Plant; and various subdivision road, bridge and drainage projects. Responsibilities included structural design of clarifiers, filtration, chemical buildings and laboratories, and associated civil design of road access, parking and drainage facilities.

5/70 - 9/73 - Greeven & Stoeltje, Consulting Engineers; Austin, TX; Project structural design engineer for various projects including elementary schools at Braker Lane, Rundburg Lane and Austin High School; Water Resources State Office Building, Travis County Courthouse Annex and Parking Garage, University of Texas Regents Building, various University of Texas buildings, smaller office and retail buildings, and University of Texas of the Permian Basin. Responsibilities included full charge design, coordination of drafting and some project inspection. Developed computer software for building analysis. Buildings varied in size from single story to twelve-story structures.

9/68 - 5/70 - Structural Engineer; Eugene Wukasch & Associates; Austin, TX; Design engineer in charge of working drawing preparation, coordination between various design professionals, field inspection and client negotiation for various buildings, including retail facilities, apartments, churches, mobile homes, mobile schools and various projects for the Corps of Engineers. Military projects included aircraft hangars and offices, commissary expansion and WAC barracks at Ft. Sam Houston and Brooks AFB.

10/67 - 9/68 - Associate Engineer; Fluor Corporation, Houston, TX; Project engineer in charge of structural design of petrochemical facilities, including buildings, pipe support structures and foundations, and civil design of drainage, pavement and wastewater collection and disposal. Responsibilities included directing a team of engineers involved in specialized design of steel and concrete tower structures for wind and earthquake loadings. Clients included Texaco and Petrotex Petroleum Company. Most projects exceeded \$5 million in construction value.

8/66 - 10/67 - Structural Designer; Brown & Root, Inc., Houston, TX. Design engineer of domestic, foreign and offshore facilities including docks, warehouses, petroleum facilities, drilling platforms, and government buildings. Much of the design work performed during this period encompassed numerous smaller components of larger structures, such as specialized design of concrete retaining walls, column and composite beam design, buckling and fatigue analysis of structures subjected to impact from floating vessels and ice flows, and specialized steel connection design. Most projects were undertaken in a team-effort atmosphere. Clients included Gelgy Chemical Company and Nakoosa Edwards Company.

1/65 - 8/66 - Student; University of Texas; Austin, TX; Working toward Master of Science degree in Architectural Engineering. Worked as a teaching assistant in the Department of Drafting.

6/63 - 9/63 - Structural Draftsman; Preston M. Geren, Architect-Engineer; Ft. Worth, TX; Duties included structural drafting and minor engineering calculations. Projects included various office buildings and high schools. Structural experience included elementary steel connection and base plate design, concrete footings; concrete slab on grade; suspended concrete channel floor systems; and masonry load bearing wall analysis. Other duties included coordination between structural and architectural departments and checking of shop drawings for various projects.

6/61 - 8/61 - Rodman; Texas Highway Department; Midland, TX; Surveyor duties, including quantity takeoffs and measurements; soil tests; surveyor calculations and duties.

9/60 - 1/65 - Student; University of Texas; Austin, TX; Working toward Bachelor of Science degree in Architectural Engineering.

PROFESSIONAL MEMBERSHIPS:

- American Institute of Steel Construction
- American Concrete Institute - Previous
- National Council of Engineering Examiners
- Texas Society of Professional Engineers
- National Society of Professional Engineers
- American Society of Civil Engineers

Past Memberships:

- Chairman - Building Code Review Committee - Midland
- Chairman - Planning & Zoning Committee - Midland
- Planning & Zoning Commission - Midland
- Utility Windowpane Advisory Committee - Midland

PUBLICATIONS:

- Melton - "Structures Video Seminar" 1988 thru 1997.
- Melton - "When the Bough Breaks: Building Failures and the Structural Engineering Expert" - 1989; workbook revised 1996.
- Melton - "Failures of In-Service MPC Parallel Chord Wood Floor Truss Components Reveal Deficiencies in ANSI/TPI Standards - 2000
- Melton - "ADA-A/E Title III Design Video Seminar", 1994.

**THOMAS JUNE MELTON, III PARTIAL PROJECT LISTING
INCLUDING AMSTAR ENGINEERING PROJECTS
(Significant projects listed only)**

The following partial listing reflects the types of projects for which Thomas June Melton, III has provided engineering services:

FOR AMSTAR ENGINEERING:

A-1 Fire & Security Foundation / Drainage Evaluation – Waco
A-1 Rental Store - Austin
Academy Surplus Foundation/Tiltwall/Framing - Austin
6903 Agave Cv. Plumbing/Structural – Austin
Aircraft Scaffolding - San Antonio
Airport Marriott Mezzanine - Austin
Alamo Business Center/City Park Buried Utilities Investigations - San Antonio
American Freight Drainage Analysis / Drainage Utilities - Schertz, TX
824 Angel Light – Lake Travis
Applehead Cove Repairs - Horseshoe Bay, TX
Applied Materials - Austin
Architectural Metals (Thresholds) Copyright Dispute - Houston
14731 Arrowhead – Lake Travis, TX
Austin/Bergstrom Airport Pedestrian Bridges - Austin
32 Autumn Oaks Dr. Roof Framing/Water Damage/Repair – Hills of Lakeway
AVAL Boat Dock - Austin
Baby Acapulco Restaurant Addn. - Austin
Balcones Club Apartments Investigation - Austin
Bank United - Austin
Beaumont Federal Correctional Complex - Beaumont, Tx
#11 Beecher St. Structural Repairs - Austin
Bell Towers Drainage/Parking - Austin
2315 W. Ben White Medical Facility Evaluation - Austin
4311 Benedict Flood Damage/Drainage Investigation - Austin
Best Western Hotel Stucco / Water Intrusion - Austin
12432 Beverly Village Ct. #6 Wind Bracing / Framing Repairs - Austin
Bingle Road Shopping Center Investigation - Houston
5325 Texas Bluebell Window Leakage/Site Drainage - Spicewood, TX
Boeing Building 3238L - Austin
Bois-Du-Lac Condominiums - Dallas
505 Bolivar Framing / Connectors / Flood Plane – Bellaire, TX
7804 Brightman Lane Structural/Truss/Water Penetration – Austin
4805 Brook Creek Cove Foundation Investigation - Austin
Brookstone Apartments Third Floor Walkway Removal – Austin
Bridge Partial Collapse Inv. - Hwy 518, Shreveport, LA
603 Bull Creek Stabilization – Austin
1441 Bull Horn Loop Foundation/Drainage – Round Rock
Bullock, Sandra, 2801 River Hills Road Multi-Damage Investigation - Austin
4600 Bunny Run Structure – Austin
7304 Burnet Rd Fire Damage Investigation - Austin
Butterfield I & II Investigation - San Angelo
1109 C&D 15 1/2 St. Structural / Foundation / Drainage - Houston
Camino Real Apartments Canopy/Structure/Hazards – Austin

4300 Canoas Roof Framing - Austin
2400 Canoas Drive Structure - Austin
240 Canterbury Truss/Beam Deficiencies - Dripping Springs, TX
221 Canyon Trail Swimming Pool Analysis - Austin
CAP Water Treatment Plant - Tucson, AZ
Capital Metro Bus Parking/Retaining Walls/Flood Study - Austin
Capital Metro Maintenance Building Drainage/Structural Addition - Austin
Cardinal Hills Unit 7 Wastewater Study - Travis County
Casa Grande Hwy. Flood Relief & Bridge Rail - Phoenix, AZ
3408 Cascadara Drainage/Structural - Austin
Cathelena's Restaurant Structural/Septic - Cedar Park
220 Cedar Hurst Lane Chair Lift Analysis - Lake Travis
11094 Cedar Park Drainage/Structural - San Antonio
Cedar Park Community/Recreational Center Stairs and Rails - Cedar Park
2725 Cedar Springs Framing/Foundation/Drainage/Moisture Investigation - Round Rock
2714 Cedar Springs Framing/Foundation/Drainage/Moisture Investigation - Round Rock
Centercourt Drainage - Austin
Centex Retaining Wall Collapse Inv. Rivermist/Waller Ranch - San Antonio
Chainsaw Massacre Movie Set Structural Analysis - Austin
8400 Chalk Knoll Foundation/Pool Investigation - Austin
8904 Chalk Knoll Drive Fireplace/Chimney/Water Intrusion Inspection - Austin
25938 Chapman Falls Foundation / Drainage Inv. - Richmond, TX
Chase Apartments Roof / Structural / Moisture Assessment - Austin
City-County Jail - Oklahoma City, OK
City National Bank - Austin
City Park Recreation Building - San Marcos
9403 Clearrock Additions - Austin
Cole Baptist Church Roof Truss Failure/Injury - Duncanville
College House CoOp Rehab - Austin
College Park Shopping Center - Killeen
Colorado Building Improvements - Austin
Commadore Riverboat Hull Repairs - Austin
111 Congress Sign - Austin
Congress Ave. Mini Storage Fire Damage Investigation - Austin
Continental Construction Casino Delay Damages Evaluation - Alabama
Convenience Store Canopy - Fredricksburg
2208 Conway Cove Framing Assessment - Pflugerville
Copperas Cove Jr. High Connections - Copperas Cove
225 Corinthian Swimming Pool/Septic System Investigation - Lakeway
Cornett Roof Truss Failure/Injury - Austin
Corridor Park 5 - Cort Furniture - Austin
2150 Cottonwood Creek Foundation/Pool Assessment - Austin
Coulver Rd. Septic Systems - Austin
617 Coventry Residential Design - Austin
Crane Manbasket - Austin
2905 Creeks Edge Parkway Masonry Repairs - Austin
911 Cross Wind Investigation - Austin
Crossland Economy Studio - Austin
Cypress Semiconductor Improvements - Austin
DART City Place - Dallas
DART Improvements - Dallas
Days Inn - Diamond Bar, CA
Dean Witter Sign - Austin
9212 Decker Lane Site Damage Assessment - Austin
Deeb Wood Truss Defect Investigation - WV
Delatte Mobile Home Moisture Intrusion/Structural/Ventilation/Plumbing - Louisiana

Denver Pavilions Shopping Center - Denver, CO
Department of Economic Security West - Phoenix, AZ
Dittmar Lumber Warehouse - San Antonio
Doss Road Wastewater System - Travis County
12508 Dover Drive, Montgomery, TX (Chapman)
Downtown Triparty Bridge - San Antonio
Duska Swimming Pool - Austin
Dutchman's Market Freezer Building Investigation - Fredericksburg
Duval County Courthouse Water Intrusion/Superstructure/Civil - San Diego, TX
421 East 6th ADA Issue - Austin
805 East 32nd St. Medical Offices Foundation/Plumbing - Austin
#13 Ehrlich Pool/Retaining Wall Repairs - Austin
Educare Housing - Austin
Eisley Library Door Accident - Lincoln, NE
El Monterrey Apartment Foundation Investigation - Austin
Engineering ethics opinion letter (confidential)
Encycle Texas Plant Dismantle Investigation - Corpus Christi
2408 Enfield Waterproofing and Drainage Investigation - Austin
Entertainment & Sports Arena - Raleigh, N.C.
Escala Apartments - Retaining Wall Failure / Drainage - Austin
Esther's Follies Expansion - Austin
12210 Fairhaven Foundation / Drainage Inv. - Montgomery, TX
Far West Skyline Condomium Rehab - Austin
101 Fawn Meadow Repairs - Austin
101 Fawn Hollow Bracing, Windows, Foundation Issues - Dripping Springs, TX
FDNS Medical Building Thermal Barrier / Vinyl Materials Investigation - New Braunfels
FDNS Medical Building Thermal Barrier / Vinyl Materials Investigation - Seguin
101 Firebird Pool/Wall - Austin
121 Firebird St. - Roof repairs - Lakeway, TX
Flamingo Cantina Canopy & Mezzanine - Austin
Fleetwood Subdivision - Memorial Dr. Flood / Water Barrier Drainage Investigation - Houston
Flower Mound High School Lewisville ISD Water Discharge - Flower Mound, TX
Forest Creek Aerial Crossing - Pflugerville
Forest Creek Retaining Wall/Culverts - Pflugerville
Forest Oaks Wastewater Wetwell - Cedar Park
Ft. Bliss Hangar Door Investigation - El Paso
304 W. 4th St - Austin
807 E. 14th St. Condo Building Water Penetration/ Structural - Austin
Foundation/Superstructure Analysis - Primary School - Eagle Lake
Foundation Analysis 11620 Loweswater - Austin
509-521 Franklin Investigation - Waco
2800 French Place Drainage/Structural Investigation - Austin
Fresno Federal Courthouse Structural Assessment - Fresno, CA
Fruit-O-Loom Slip/Fall Investigation - Harlingen, TX
Fulkes Middle School Beam Connections - Round Rock
Gables at Barton Creek Column Repair - Austin
Galleria Oaks Shopping Center Investigation - San Antonio
4205 Gattis School Road Pavement Assessment - Round Rock, TX
11901 Gateway Swimming Pool/Flooding/Drainage - Austin
General Mail Facility - Bryan
General Telephone & Electric - Irving
Georgetown Jet Addition - Georgetown, TX
42 Governors Court Structural/Fire Inspection - Austin
Grace Lutheran Church - Wimberly
Grand Casino - Tunica, MS.
Grand Casino Hotel Structures - Biloxi, MS

9714 Grand Oaks Low Speed Car Crash - Structural Damage - Austin
Granite Quarry Plant Warehouse - Austin
Grapevine Market - Austin
Greathouse Elementary Platforms - Midland
Greatland Office Park Improvements - San Antonio
Hackberry Convenience Store Canopy - San Antonio
Habitat Village Investigation - Austin
Harbor Circle Swimming Pool Investigation - Georgetown
Harthan House Apartments (Historic) - Stabilization and Restructure - Austin
Hartman Post House - Lake Travis
Hatch/Carr/Ashcreek Structural Investigation - Austin
Headquarters Bldg - Kirtland AFB
20707 Henry Floor/Roof Decking Investigation - Lago Vista, TX
High Drive Foundation Dispute Resolution - Lago Vista
Highcrest Apartments Drainage / Trusses - San Marcos, TX
Highway 290 W 33ft Billboard - Austin
Hill Country Apartment Fire/Fireplace Damage Investigation - San Marcos, TX
Hill Country Apartment Foundation Investigation - San Marcos, TX
Hilton Hotel Wood Truss Defect Assessment - Oklahoma City, OK
Hoffbrau Restaurant Addition - Austin
Holiday Inn Select Loop 410 Retaining Walls/Porte-Cochere - San Antonio
Holiday Inn Select Canopy Wall - San Antonio, TX
Holloman AFB F117A Maintenance Docks/Hangars - Alamogorda, NM
6212 Holloway Residential Foundation/Superstructure Damage Repair - Austin
Hollywood Video Inspection, 1050 I35 - Georgetown
Horizon/Warner Bros. Sound Stage 3 & 5 Structural - Austin, TX
Horseshoe Casino Parking Garage Stairs - Bosier City, LA
Horseshoe Casino Stair Tower - Bosier City, LA
Hunter Construction Co. Steel Building Fire Investigation - New Braunsfels
Hurricane Katrina/Rita Damage Evaluations - MS, LA, TX
12343 Hymeadow Investigation - Austin
5508 Hwy 290 Seismic Evaluation - Austin
Ingleside Fleet Mine Center - Ingleside
Ingleside Village Apartments - Ingleside
International Center for Trade Truss Connections - Eagle Pass, TX
J.C. Penny Wall Collapse - Dallas
Jester Estates Oceanquest Pool Investigation - Austin
Joe's Crab Shack Restaurant Code Violations / Hazard Analysis - Houston
Jonestown Lighthouse - Lake Travis
126 Kittle Lane Foundation / Drainage - Three Rivers, TX
19 Knob Hill Circle Interim Deck Repair - Austin
Knox OSSF Feasibility Study - Austin
Knuckleheads - Austin
Lake Creek Village Shopping Center - Austin
5475 Lakeshore Drive Roof Assessment - Lago Vista
24714 Lakeside Cove Structural Inspection - Austin
Lakeway Church Fellowship Hall - Lakeway
6609 N. Lamar Fire Investigation - Austin
10817 N. Lamar - Roof Structure Repair - Austin
1607 S. Lamar - Austin
Lamar Craton Truss Collapse/ Injury - Alabama
Lanshire Duplex Stair Collapse Investigation - Austin
Lake Austin Riverboat Docking Facility - Austin
Lake Travis Lighthouse - Jonestown, TX
Lake Travis Post Office - Lakeway
4807 Lake Wichita Foundation / Drainage Inv. - Richmond, TX

1010 N. Lamar Roof/Wall Restructure - Austin
1420 N. LBJ Dr. Vibration/Energy Investigation - San Marcos
10807 Legends Lane Plumbing Leak Damage - Austin
Lewisville ISD School Construction Deficiency Evaluation - Lewisville
Light Bar Addition - Austin
1487 Little Bear Foundation Evaluation - Hays County, TX
LoLa Convalescent Ctr. Roof Collapse Investigation - Austin
Lockheed Maintenance Facility - Austin
Lockheed Missile Mezzanine - Austin
Log Cabin Structural/Foundation - New Mexico
13915 Lone Rider Trail Trusses - Austin
2401 Longview Phi Kappa Psi Temporary Structure - Austin
Louisiana State Highway Timber Bridge Collapse - LA
11620 Loweswater Drainage/Structural - Austin
Luis Fall / Injury / Roof Framing / Fasteners Issue - Houston
606 W. Lynn Condos Investigation - Austin
McCracken Pool Trusses - Austin
McCreary County USP - Kentucky
202 E. Main Restaurant Fire Damage Repair - Round Rock
Malmin Structural Damage Assessment Flooding/Drainage/Utilities - Austin
Mandalay/Circus Circus ADA Shower Seat/Injury Investigation - MS
Marble Falls Quarry Office Building - Marble Falls, TX
711 Marshall St. Foundation / Frame Investigation - Houston
819 Mariner Structural/Foundation Investigation - Round Rock
703 Marne Ln. Lightning Damage Assessment - Houston
Masonry Column Collapse Investigation - Houston
2518 Mathews Balconies / Boat Dock / Helicopter Pad Inv. - Austin
Maxwell Car Wash - Taylor
Maxwell Wastewater - Austin
Meadowbrook Gardens Apartments Designs/Inspections - Cedar Park
Meadowlakes Shopping Center - Marble Falls
Medical Center Automatic Door Closer Accident - Bentonville, AR
Memorial Baptist Church Trusses - Killeen
Menard BiFold Door Accident Investigation - Janesville, WI
Mezzaluna North - Austin
Micron Devices Seismic - Utah
310 Mitchell Foundation / Plumbing - Weatherford, TX
Mississippi Interstate Bridge Collapse - MS
2004 Mistywood Residential Repairs - Austin
Morrow Roof Member Collapse/Fall - Birmingham, AL
205 W. Morse Moisture/Mold/Storm Windows - Fredericksburg, TX
352 Mostyn Ln. Foundation / Framing Evaluation - San Marcos
Motel 6 Balcony/Stairs Restructure - Amarillo
Motel 6 Balcony/Stairs Restructure - 8010 N. 136 - Austin
Motel 6 Hurricane Ike Damage Evaluation / Reconstruction - Jersey Village, TX
Motel 6 Hurricane Katrina Damage Assessment - Biloxi, MS
Motel 6 N.IH35 Additions - Austin
Motel 6 Walkways/Stairs - Topeka, KS
Motel 6 Structural/Civil Evaluation - Camp Springs, MD
Motel 6 Structural/Civil Evaluation - Cranberry, PA
Motel 6 Structural/Civil Evaluation - Moline, IL
MSI Shop Expansion - Kyle
Mt. Olive Lutheran Church Addn. - Austin
Motorola Building "W" - Austin
Moss C.J.C. - Oklahoma City, OK
Museum of the Southwest Accident / ADA evaluation - Corpus Christi, TX

N.A.S. Commissary - Kingsville
 Nellis AFB Composite Facility - Las Vegas, NV
 New Elitch Gardens Theme Park - Denver, Co.
 413 New Ledo Swimming Pool Investigation - Austin
 New Lexington Fayette County Detention Center - Lexington, KY
 New Territories Shopping Center Investigation - San Antonio
 1211 Newton / Austin Motel Retaining Wall Collapse Repair Analysis - Austin
 19 Nob Hill Circle Structural Expansion Study - Austin
 North High School - Carrollton
 North Hills Townhouse Foundation Investigation - Austin
 North Lamar/Kramer Lane Warehouses - Austin
 North Park Hotel Fire/Fireplace/Truss Repairs - Austin
 1210 Nueces - Veneer / Deck / Stair Repairs - Austin
 250 Oak Heights Barrier Drain - Wimberly
 Oak Knoll Residential Foundations - San Marcos
 Oakwood School Trusses - College Station
 10807 Oasis Foundation Failure Inv./Negotiation - Houston
 4802 Ocean Drive Structural/Ventilation Assessment - Corpus Christi, TX
 Oilfield Road Hwy. Intersection Accident / Drainage / Non-Licensed Engineer - LA
 Old Lockhart Hwy. Mobil Home Park - Travis County
 Olivarez Subdivision/Utilities/Street Collapse Investigation - McAllen
 Oltorf Oaks Apartments Chimney Fire Investigation - Austin
 One Corporate Center Investigation - Austin
 One Liberty Place Improvements - Waco
 One Tech Plaza - Austin
 Oyster Landing Boat Docks - Austin
 Paleface Grocery - Travis County
 Palm Valley Retain Stucco / Substrate - Round Rock
 Paniagua Truss Collapse/Injury - Phoenix, AZ
 12892 Park Art Studio - Austin
 Park Central Apartments Stair Fall Inv. - Dallas
 6103 Peachtree Hill Ct Drainage / Foundation Damage - Kingwood
 2212 Pearl Fire Damage Inspection - Austin
 540 Pecan Grove Boat Dock Improvements - Horseshoe Bay
 Penbrook Apartments Masonry Veneer Repairs - Austin
 Penbrook Club Apartments Building 6 Breezeway Inspections - Austin
 J. C. Penny Brick Veneer Wall Collapse - Dallas
 Pete Maravich Assembly Center Investigation - Baton Rouge, LA
 Point Venture Townhouse Multi Building Structural Assessment - Point Venture, TX
 Precision National Structural Investigation - Waco
 Public Housing Fall Hazard Investigation - San Antonio
 29384 Raintree - Plumbing / Foundation / Superstructure Investigation - Fair Oaks Ranch
 Rayco Fire Retardant Investigation - San Antonio
 RCBS Hospital HVAC / Contract Issues - Austin
 1913 Real Catorce Foundation/2nd Floor Framing Repairs - Austin
 Recreation Sports Building/A&M/Window Wall - College Station
 Red Robin Restaurant Air Quality/Moisture/Roof/wall Leaks - San Antonio
 Regency Manor Apartments Structural Walkway Replacements - San Antonio
 Regents School Water Intrusion/Wood Floor Damage Investigation - Austin
 8910 Research Parking Lot Investigation - Austin
 12034 Research High Speed Vehicle Collision Vibration/Energy Damage Assessment - Austin
 Retano Wastewater System - Austin
 2816 Revere Townhouses Foundation / Superstructure Inv. - Houston
 1913 Rio Catorce TJI Floor Joist Investigation - Austin
 River Authority Conveyor - San Antonio
 3800 Rivercrest Boat Dock Feasibility Study - Austin

2311 Rogge Ln Swimming Pool Leak/Foundation Assessment – Austin
Rone Cellphone 160 Ft. Guyed Tower - Barton Creek, Austin
Round Rock Express Baseball Stands/Rails – Round Rock
Round Rock Express Cables/Structural Designs - Round Rock
Round Rock Express Supports – Round Rock
10713 RR 620 Roof Assessment - Austin
12301 Saber Trail Wind Load Stabilization – Austin
Sam Bass Road Concrete Pavement Analysis - Round Rock, TX
Samsung U. Project I Beam Connections - Austin
San Antonio Housing Authority v. Magi Realty - Litigation, 150 + Houses - San Antonio
2200 Scenic Boat Dock Repairs - Austin
16020 Scenic Oaks Trail Flood Analysis – Buda, TX
Schneider Manufactured Home Investigation - La Grange, TX
Secretariat Masonry Arches/Drainage - Hayes Co., TX
Segefield Drainage Study - Austin
6106 Shadow Mountain Structural Repairs – Austin, TX
Sharper Image Mezzanine - Austin
Sheraton Hotel Parking Garage Repairs - Austin
Silver Pine Pool - Austin
Simplex Grinnell Structural Evaluation – Pflugerville, TX
Sir Ivor Cove Swimming Pool Evaluation - Austin, TX
419 E. Sixth St. Second Floor Rehab - Austin
421 E. Sixth St. ADA Investigation - Austin
500 E. Sixth Rehab - Austin
500 E. 6th Fire Escape Restructure – Austin
505 E. 6th Structural Investigation - Austin
515 E. Sixth Roof Framing - Austin
600 E. Sixth Roof & 2nd Floor Framing Evaluation - Austin
723-725 E. Sixth Rehab - Austin
10211 Skyflower Floor Stabilization – Austin
Skylight Accidental Breakage/Fall / Injury - Mission, TX
Skyridge Plaza Structural Inspection - Round Rock, TX
South Grand Prairie High School - Grand Prairie
329 South Guadalupe Water Intrusion - San Marcos
Southlake Shopping Center Stairs - Southlake, TX
Southlake Subdivision Sanitary Sewer Collapse – Southlake, TX
120 South Main Roof Drainage Issue - Victoria
South Texas Art Museum - Structural Barriers / ADA / Injury - Corpus Christi
Southwest Medical Park - Austin
Southwest Texas State University Bridge - San Marcos
Southwestern University Fine Arts Investigation - Georgetown
SpeedFabCrete Tilt Wall Investigation - San Antonio
702 SpringBrook Water/Floor Truss Damage - Leander
St. Paul's Catholic Church Addition - Austin
St. Pete Times Forum Arena Concrete Tolerances Evaluation – Tampa Bay, FL
#18 St. Stephens Pool Investigation - Austin
Stair and Guardrail Designs - Sheppard AFB
St. Stephens School, Quinn Hall Addition - Austin
Stahl Roof Condition Assessment - Austin
Stayton Water Damage - Hardwood Flooring /Plumbing / HVAC Spec. Mediation - Victoria
Steck Vaughn Floor Structure Investigation - Austin
119 Stephens Lane Window Leakage Investigation – Round Rock
Stop and Go Boat Storage Inspection - Austin
Studio 6 Motel Sam Houston Parkway Foundation/Flooding/Plumbing - Houston
Stum Ladder Fall Investigation - Arlington
5353 Sugar Hill Foundation / Swimming Pool / Drainage Investigation - Houston

Summit Apartments Wood Balcony Investigation – San Marcos, TX
 Summit at West Rim Foundation - Austin
 Sun Oil E/W Pipe Rack - Houston
 Sunchase Condos Investigation - Austin
 Sunchase Unit 102 - Austin
 Sunfish Wastewater System Improvements - Austin
 Sunnyvale Condominiums Replacement Stairs – Austin
 Superstructure Analysis Riverview Apartments - New Orleans, LA
 Superstructure Analysis Shadowlake Apartments - Jefferson Parish
 TAMU Recreation Sports Building - College Station
 Texas Department of Banking Structural Investigations - Austin
 Texas Department of Corrections - Abilene
 Texas Department of Corrections Alberti Unit - Abilene
 Texas Department of Corrections - Beaumont
 Texas Department of Corrections - Beeville
 Texas Department of Corrections - El Paso
 Texas Department of Corrections - Gatesville
 Texas Department of Corrections - Harris Co.
 Texas Department of Corrections - Hutchins
 Texas Department of Corrections - Liberty Co.
 Texas Department of Corrections - Mitchell Co.
 Texas Department of Corrections - New Boston
 Texas Department of Corrections - Plainview
 Texas Department of Corrections - Wichita Falls
 Texas Department of Corrections - Karnes County
 Texas Department of Corrections Tower - Amarillo
 Texas Department of Health Laboratory Stairs/Guardrails - Austin
 Texas Land & Cattle Co. Restaurant Fire Investigation – Richardson, TX
 Texas Supreme Court Buildings B & C - Austin
 Thaxton Road Septic Systems - Travis County
 315 W. 35th Apartment Foundation/Plumbing/Superstructure – Austin
 2909 Thousand Oaks Truss Evaluation – Austin
 27 Tiburon Dr. Groundwater/Drainage/Foundation – Hills of Lakeway
 408 Tilbury Construction Deficiencies - Austin
 9816 Timber Ridge Pass Septic Investigation – Austin
 Timbers Apartments Structural / Drainage/ Plumbing Evaluation - San Marcos, TX
 Tolt Water Treatment Plant Design Deficiency Evaluation – Seattle
 5812 Tom Wooten Drive Floor Trusses/Water Intrusion/ Bracing - Austin
 Tower Carwash Pavement / Building Water Leakage Evaluation - Round Rock
 Town Lake Villas Drainage/Water Intrusion/Structural – Austin
 TOWTRC Council Training Center Evaluation/Report – Texas
 Twenty-First Street CoOp/ Commons Investigation - Austin
 Twenty-First Street CoOp Structural Lofts - Austin
 U.S. Naval Station - Ingleside
 Unity Church Structural Investigation - Austin
 University of Houston Athletic Facility - Houston
 University of Texas Life/Health Steel Connections - Brownsville
 University of Texas Memorial Stadium Additions - Austin
 University of Texas Residence Dorm Stairs - Austin
 University of Texas Soccer Stadium - Austin
 University of Texas Tower/Observation Deck Investigation - Austin
 University of Texas West Grandstand - Austin
 USP Atwater Code Issues - Austin
 230 Vailco Lane - Wall Plumbness / Structural Framing - Austin
 230 Vailco – Wall Bracing/Plumbness Issues - Lakeway
 Valley View Apartments Water Break / Structural / Condemnation - Georgetown

1802 Vance Circle Drainage / Foundation Deficiencies - Austin
Victoria Square Roofing Repair Scope - Austin
Village at Gracy Farms Roof Assessment - Austin
12600 Wallisville Inspection - Houston
3909 Warehouse Row Structural/Remediation - Austin
1803 Warwick Cove Moisture/HVAC/Structural Investigation - Round Rock, TX
Water/ Wastewater No. 19 Walkways and Guards - Travis Co.
Waterfront Condo Boat Docks - Austin
Waterloo Ice House Additions - Austin
Weberg Furniture Store Roof Collapse Investigation - Temple
Wells Fargo Bank ATM/Parking Lot Injury - Pasadena, TX
Wendy's Restaurant Ladder Investigation - San Antonio
1701 West Avenue Structural Investigation - Austin
Westchester Apartments Investigation - San Antonio
Western Currency Tower - Ft. Worth
Westmoreland Bridge Collapse Investigation - Dallas
Wildier Self Storage - Alabama
2606 Wilson St. Apartments - Stair Repairs / Upgrades - Austin
Williamson County Annex - Taylor, TX
Willow Creek Apartments Roof Investigation - Houston
Wimberly Wastewater Holding Tank - Wimberly
2730 Winding Brook Structural/Civil - Austin
6402 Woodhue Foundation/Structural Investigation - Austin
Zone Apartments Swimming Pool/ Building Foundations - San Marcos, TX.

FOR OTHER FIRMS:

American Founders Office Building - Austin
American Oil Company No. 1 Ultracracker - Texas City
Austex Food Processing Facility - Austin
Austin High School Improvements - Austin
Austin's Colony Wastewater Treatment Plant - Travis County
B&R Instrument Building - Houston
Bain Road Mobile Home Park - Travis County
Banister Lane Flood Control - Austin
Bastrop County Bridge - Bastrop
Baxter Residence - Midland
Bayou Bend Townhouses - Midland
Beal Lakehouse Facilities - Brownwood
Bergstrom AFB Improvements - Austin
Bergstrom AFB Squadron Operations - Austin
Big Spring High School Remodeling - Big Spring
Bluebell Estates Mobile Home Park - Travis County
Bluebell Ridge Mobile Home Park - Travis County
Bluebonnet Mobile Home Park - Travis County
Brackenridge Hospital Expansion - Austin
Braker Lane Elementary School - Austin
Brown Distributing Company Improvements - Austin
Brown Residence - Midland
Brown School Improvements - Austin
Browning Hangar Improvements - Austin
Brushy Creek Bridge - Round Rock
5046 Bull Creek Office Building - Austin
Burleson Residence - Midland
Bus Transit Facility - Austin

Butcher Mfg. Foam Panel Testing - Lafayette, LA
Campbell Center - Dallas
Capital of Texas Plaza Storm Structures - Austin
Casbeer Miniwarehouse Park - Midland
Cat Mountain Subdivision - Austin
Cedric's - Midland
Celanese Chemical Company Signage - Houston
Chandler Building - Austin
Charlie's Liquor Store and Warehouse - Austin
Charlton Ranch Facilities - Brewster County
Charter Hospital - Austin
Chevy Chase Center Federal Express - Austin
Church of God of Prophecy - Midland
Church of The Holy Redeemer - Austin
Church of The Rock - Odessa
Clark Residence - Menard
Clearview Office Building - Midland
Clifton Lutheran Sunset Home - Clifton
Cody Cattle Company Restaurant - Midland
Coffey Residence - Austin
Colbert Residence Wastewater - Austin
Collins Residence - Midland
804 Congress Office Building - Austin
Coors Distributor Facilities - Midland
Cornerstone Apartments - Austin
Courtyard Apartments - Midland
CreditBanc Building Far West Blvd. - Austin
Creedmore Meadows Drainage - Austin
Crescent Place - Midland
Cross-Town Sewer Interceptor - Austin
Culver Road Estates Mobile Home Park - Travis County
Dairy Queen/ N. Lamar - Austin
Davenport Residence - Midland
Davis Water Treatment Plant, Phase III - Austin
Deepwater Docking Facilities - Kuwait
Devine Junior High School - Devine
Dobie Junior High School - Austin
Dole Residence - Midland
Downtown Fire Station - Livingston
Driftwood Surveying / ATS Pecan Springs Subdivision Review - Austin
Duncanville Apartments - Duncanville
East Side Park Improvements - Austin
East Texas Pulp & Paper Improvements - Houston
Eighth Street Arms Apartments - Austin
El Chico Restaurant - Midland
Elroy Road Mobile Home Park - Travis County
Emerson Place Masonry Investigation - Midland
Enfield Plaza Foundation Improvements - Austin
Fann Cantilever Crane #1 - Austin
Far West Blvd. Swimming Pool - Austin
Fields Residence - Odessa
First Presbyterian Church - Coleman
Fisher Scientific Laboratories - Atlanta, GA
Ft. Sam Houston Base Facilities - San Antonio
Ft. Sam Houston Commissary Expansion - San Antonio
Forum Shopping Center Improvements - Austin

Garden City Hwy. @ FM715 Warehouse - Midland
Gary Job Corps Center - San Marcos
Gattis School Road Conv. Store Improvements - Round Rock
Geigy Chemical Corporation - Louisiana
Gethsemane Lutheran Church Improvements - Austin
Glenwick Apartment Conversion - University Park
GM Steakhouse/Congress Ave. - Austin
Goforth Village Wastewater Plant - Austin
Gooch Residence - Midland
Grandview Warehouse - Odessa
Greenville Ave. Condos/Apartments - Richardson
Griffith Residence - Midland
Grosec Medical Building - Midland
2000 Guadalupe Office Building - Austin
2200 Guadalupe Office Building - Austin
Gulf States Utilities Pump Station - Montgomery County
Hemphill Park Apartments - Austin
Henderson Residence - Midland
Henderson Vessel Foundations - Midland
Henderson Warehouse - Midland
Hickory Farms - Midland
Hillander School Expansion - Midland
Hilton Hotel Improvements - Midland
Hinesly Restaurant - Merkel
Hissom Residence - Midland
Holiday Hill Landfill - Midland
Housing, Water and Wastewater Improvements - Kuwait
Huggins Pumping Unit Service Warehouse - Midland
Hunter Residence - Midland
Idlewild Village - Midland
Inverness Condominiums - Bastrop
Jefferson Building - Austin
Jollyville Rd. Office Building - Austin
Jonsson Additions - Midland
Kelly AFB Facilities - San Antonio
Kennedy Residence - Midland
La Amistad Restaurant - Midland
La Prada Subdivision - Garland
Lackland AFB Exchange Sales - San Antonio
Lackland AFB Facilities - San Antonio
Lackland AFB Police Operations - San Antonio
Lackland AFB Shop Clothing & Equipment - San Antonio
Laughlin AFB Air Rescue Opns. Bldg - Del Rio
Laughlin AFB Shop Aircraft Bldg - Del Rio
Leander Hills Water and Wastewater - Austin
Leander Post Office - Austin
Lewis Sign Co. Signage - Austin
Lewisville Apartments - Lewisville
Los Patios Restaurant - Midland
McAngus Road Mobile Home Park I & II - Travis County
206 Main Building - Midland
Manchaca Mobile Home Park - Manchaca
Mathews Elementary School - Austin
Metro Building Improvements - Midland
Mewhorter Residence - Midland
Midland High School Improvements - Midland

Midland Savings Association - Midland
Missouri Street Restaurant - Midland
Monopod Structure - Cook Inlet, AK
Mustang Meadows Wastewater - Austin
Nakoosa Edwards Paper Plant - Arkansas
Nash Building - Austin
Nieta's Cafe Addition - Midland
North Austin Junior Swimming Pool - Austin
North Blvd. Addn. Office Building - Midland
Northchase II Office Building Improvements - San Antonio
O'Donnell Residence - Midland
Ogden Office Buildings - Austin
Old Southern Ice House - Midland
Oltorf Rd. Office/Warehouse Park - Austin
O'Neill Barbeque - Midland
Pappagallo Expansion - Midland
Parkwood Apartments - Richardson
Permian Electronics Radio Tower - Midland
Petro-Tex Neoprene Plant - Houston
Petroleum Museum Central Power - Midland
Pflugerville High School - Pflugerville
Piney Creek Bridge - Bastrop
Plantation Hills - Midland
Plaza Center No. 15 - Midland
Plaza Office Building "K" - Midland
Plaza Shopping Center Buildings F1 & F3 - Midland
Plaza Shopping Center Signage - Midland
Pollard Residence - Midland
Princeton Business Center - Midland
Public Safety Building Improvements - Midland
Radio Shack - Midland
Ramsey Medical Center - Austin
Ramsland Residence - Midland
Renner Road Subdivision - Dallas
Richardson Apartments - Richardson
Ridgemar Court Investment #1 & #3 Condos - Midland
Rodriguez Restaurant - Midland
Roper Warehouse - Midland
Rowlett Flood Plane Study - Rowlett
Rusk Dental Office - Midland
St. June Subdivision - McKinney
St. Martin's Lutheran Church - Austin
St. Nicholas Episcopal Church Improvements - Midland
St. Paul Evangelical Lutheran Church - Taylor
Sam Houston State Office Building - Austin
San Felipe Neighborhood Facility - Del Rio
Sandra Street Warehouse Improvements - Austin
Scottsdale Addition - Midland
Shenandoah Townhouses - Dallas
Sheppard Memorial Hospital Improvements - Burnet
8118 Shoal Creek Dental Center - Austin
7958 Shoal Creek Medical Office Building - Austin
Shoal Creek Office Building - Austin
Showcase I - Midland
Shull Warehouses - Midland
Six Ranch - Midland County

Skillern's Drug Store - Midland
Sledge Residence - Midland
Smith Residence - Midland
Smith Building - Midland
Smithville Landfill - Smithville
South Austin Fire Station - Austin
1006 South Big Spring Addn. - Midland
Spicewood Wastewater Treatment Plant - Austin
Stephenson Warehouse - Midland
Sundae Palace - Austin
Sunshine Camp - Austin
Superior Oil Building Improvements - Midland
Sutton Place Condominiums - Midland
Texaco Offshore Drilling Platforms - Houston
Texas Department of Health and Mental Retardation - Austin
Texas Department of Human Resources - San Antonio
Thaxton-Coulver Mobile Home Park Wastewater Utilities - Travis County
Thomason Townhouses - Midland
Timberline Terrace Office Building - Austin
Town & Country Day Care Facilities - Austin
Travis County Blood Bank - Austin
Travis County Courthouse Annex - Austin
Travis County Courthouse Improvements - Austin
Travis County Courthouse Pedestrian Bridge - Austin
Travis County Parking Garage - Austin
Travis Street Low Income Housing - Midland
Treanor Equipment Co. Improvements - Midland
Tres Amigos Restaurant - Austin
Trinity Lutheran Home - Austin
Trinity Presbyterian Church Additions - Midland
Trinity School Improvements - Midland
Turner Building Improvements - Midland
Twenty-fourth Street Condos - Austin
Union Hall Baptist Church Addn - Liberty Hill, TX
Union Texas Oil Co. Extraction Plant - Geismar, LA
United States Embassy - Guyana
University Lutheran Center - Austin
University of Texas Regents' Office Building - Austin
University of Texas Harry Ransom Center - Austin
University of Texas of the Permian Basin - Odessa
University of Texas Swimming Facility - Austin
Vaughn Building Improvements - Midland
2714 W. Wall Warehouse - Midland
Washington/McGarvey St. Warehouses - Midland
Water Line Utility Improvements - Martindale
Water Tower - Martindale
Water Tower Renovation - Midland
Weatherford Landfill - Buda
Western Sizzler Steakhouse - Midland
Westgate Business Center - Midland
Westgate Acres Section 2 Subdivision/Utilities/Development- Midland
Westgate Miniwarehouse Development - Midland
Westlake High School Improvements - Austin
Westminister Manor Additions - Austin
3000 Westminister Residence - Dallas
Westminister Presbyterian Church Improvements - Austin

Wild River Canyon Park - Midland
Wilson Building - Midland
Windmill Hill Apartments - San Antonio
Winston Swimming Pool Facility - Midland
Woodlands Street, Bridge & Drainage Facilities - Woodlands
Yancey Residence - Midland
Y.W.C.A. Improvements - Richardson
Young Vehicle Storage Facility - Midland
Zoller Residence - Midland



Rimkus Consulting Group, Inc.
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McAllen, Texas 78503
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Certificate of Authorization No. F-1545

THE ORIGINAL OF THIS REPORT, SIGNED AND SEALED BY THE PROFESSIONAL WHOSE NAME APPEARS ON THIS PAGE, IS RETAINED IN THE FILES OF RIMKUS CONSULTING GROUP, INC.

Report of Findings

STRUCTURAL COLLAPSE EVALUATION

Insured: Pharr-San Juan-Alamo ISD

Claim No: 040510119089

RCG File No: 154528

Prepared For:

CHUBB INSURANCE COMPANY

P.O. BOX 42085

PHOENIX, AZ 85080

Attention:

MR. DAVID MARTINEZ

Bruce L. Morris, P.E.
Principal Consultant

Steven A. Frase, P.E.
District Manager

January 21, 2011





Bradford Russell, AIA, P.E.
Director of Architecture / Engineering
BR Architects, Inc.

Education:

Southern Methodist University, Dallas, Texas
Currently writing PhD
University of Texas at Arlington
Master of Engineering in Civil / Structural Engineering
Texas Tech University, Lubbock, Texas
Bachelor of Architecture, Tau Sigma Delta Honor Society,
Bachelor of Science in Civil Engineering, Tau Beta Pi Honor
Society, Chi Epsilon Honor Society

Professional Registration:

Registered Architect, State of Texas
Registered Architect, State of Oklahoma
Registered Professional Engineer, State of Texas
Registered Professional Engineer, State of Oklahoma
Certified to practice Structural Engineering by the Structural Engineering
Certification Board (SECB)
Registered Accessibility Specialist
National Council of Architectural Registration Boards (NCARB)
NCARB Seismic Mitigation Monograph
NCEES file holder
NCEES International Registry Certificate holder
LEED Accredited Professional
CalEMA Safety Assessment Program card holder
Texas Department of Insurance - Engineers Appointed to Perform
Windstorm Inspections

Professional Affiliations:

Dallas Chapter AIA,
Texas Society of Architects
American Institute of Architects
American Society of Civil Engineers
Structural Engineering Institute
Structural Engineering Association of Texas
US Green Building Council
Greater Dallas Planning Council, Board Member

Professional Organization Positions:

Dallas Chapter AIA,
Past Small Firms Committee Chair
Past Construction Industries Affairs Co-Chair

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National AIA

Past Executive National SFRT Committee Co-Chair
Past Member Board Knowledge Committee
Past President Dallas Structural Engineering Association of Texas –
SEAO
Current SEAO Chair to Structural Engineering Emergency Response
Plan (SEERP)
Current SEAO / AIA Liaison

Pending Patent:

Patent Application No.: 13/969,529
Patent Title: Load Bearing Structural Assembly
A Load Bearing Structural Assembly is created to transfer and absorb
loading between parts more evenly and efficiently

Selected Publications:

2000 'Columns – Monthly Publication of the Dallas Chapter of American
Institute of Architects' – The Psychology of Architectural Space,
December.

2005 'Dallas / Fort Worth Construction News' – Green design, flexible
environments, enhanced roadways among current trend – editorial
interview, September.

2006 'Dallas Office & Commercial – Real Estate Magazine' – 'What Next?',
Issue 4.

2009 'The Structural Engineer – A Publication of the Structural Engineers
Association of Texas' – Green Materials to Offset Seismic and Other
Natural Disaster Events, Spring.

2009 'The American Institute of Architects Chicago Chapter – Changing Times
/ Time for Change' – The Use of Green Materials in the Construction of
Buildings' Structure, September.

2013 'Pre-Cast Manufacturer Association of Texas – yearly membership
publication' - What happens to the structure when it is created as art?,
September.

Litigation Consulting:

2008-2012 Under contract with TBAE for reviewing and consulting on the
Architectural and Structural Engineering litigation related issues of
statutory provisions and rules enforced by the Board. This consulting
includes competence and/or legal authority of the design professional to
perform services noted as well as other issues.

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2003-2014 Various Architectural and Structural Engineering litigation consulting concerning various inter-discipline issues of practice. Various Architectural and Structural Engineering project failure investigations -- various building types.

Representative Projects (Condensed list):

Building Forensic Investigation:

2005 - 2014 Various multi-story building investigations on elevator failures (Architectural and Structural) various locations through the southeast / west - Architectural Investigation and Reporting, and Structural Engineering Investigation and reporting.

2011 DART retaining wall failure building impact investigation, Irving, Texas - 12,000 sq.ft. building adjacent to DART retaining wall experienced structural failures in foundation, paving, roof framing, exterior concrete panels, etc. - Structural Engineering Investigation and Reporting.

2010 Greenville Avenue Historic Building fire damage renovation, Dallas, Texas - 11,000 sq.ft. building footprint, 3,100 sq.ft. 2nd floor mezzanine, 6,500 sq.ft. roof top mezzanine - Structural Engineering Design and Documentation - \$1,000,000 estimated construction cost.

2007 Robert Lynn Commercial Real Estate Services, Dallas, Texas - 151 Regal Row - 180,000 sq.ft. warehouse structural forensic investigation - Structural Engineering Investigation and Reporting.

2007 WellsREIT / Emcor, Irving, Texas - 6333 N. State Highway 161 - structural investigation for various building failures including garage exterior wall joint, exterior retaining wall, exterior panel, etc. - Structural Engineering Investigation and Reporting.

2007 JP Morgan Chase, Dallas, Texas - 6300 Harry Hines - approximately 30,000 sq.ft. investigation of multi-story building - structural capacity investigation for increase in floor loading - Structural Engineering Investigation and Reporting.

Hotel Design:

2006 Courtyard by Marriott, Waco, Texas - 4,000 sq. ft. structural remodel - wood frame, wood truss, wood lateral support - Structural Engineering Design, Documentation - \$350,000 construction cost.

2003 Amerihost Inn Hotel, Gun Barrel City, Texas - 75,000 sq. ft. structural engineering design, wood frame, steel and wood lateral support, concrete foundation - Structural Engineering Design, Documentation - \$5.8 million construction cost.

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1999 Bradford Home Suites, Dallas, Houston, North Park, Texas – 85,000 sq. ft. to 109,000 sq. ft. structural engineering design, wood frame, post tension parking and foundation – Structural Engineering Design, Documentation - \$5.6 million construction cost.

Commercial Design:

2003 Informatics, Inc., Plano, Texas – 35,000 sq. ft. office / warehouse - tilt up construction, steel joist, and concrete slab on grade – Architectural Design, Production and Management - \$2.7 million construction cost.

2003 ESI, Inc., Plano, Texas – 20,000 sq. ft. office / warehouse addition to existing facility - tilt up construction, composite steel beam concrete floor, and concrete slab on grade – Architectural Design, Production and Management - \$1.8 million construction cost.

2010 Gold Metal Recyclers, Dallas, Texas – 10,000 sq.ft. office addition into existing metal building, wood, steal, and concrete - Architectural and Structural Engineering Design, Documentation - \$0.65 million construction cost.

2010 RTVF, Dallas, Texas – 6,000 sq.ft. footprint with 6,000 sq.ft. 2nd floor office reconstruct, wood, steal, and concrete - Architectural and Structural Engineering Design, Documentation - \$0.75 million construction cost.

2005 HSR Plaza Phase II, Carrollton, Texas – 14,000 sq. ft. professional office building, wood, steal, masonry, and structure – Architectural and Structural Engineering Design, Documentation - \$1.4 million construction cost.

2014 Modern Forge Texas Office, Hurst, Texas – 5,000 sq.ft. regional manufacturing office building, steel frame, masonry, EIFS, and structure - Architectural and Structural Engineering Design, Documentation - \$500 thousand construction cost.

Industrial Design:

1996 Jupiter 190 Building 4, Dallas, Texas – 200,000 sq. ft. warehouse using tilt up construction, steel joist, and concrete slab on grade – Architectural Design, Production, and Management - \$7 million construction cost.

1996 Excel Warehouse, Addison, Texas – 200,000 sq. ft. warehouse using tilt up construction, steel joist, and concrete slab on grade – Architectural Design, Production, and Management - \$6.6 million construction cost.

2005 Atlas Copco Office, Garland, Texas – 2,000 sq. ft. addition to drilling assembly areas – steel frame, composite floor 2nd floor, concrete slab on grade 1st floor – Architectural Design, Production, Structural Engineering Design, Production - \$500,000 construction cost.

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Retail Design:

- 2005 Whitetail Nurseries, Mesquite, Texas – 17,500 sq. ft. flower growing, distribution, and retail – Architectural Design, Production, Structural Engineering Design, Production - \$850,000 construction cost.
- 2004 Family Dollar Retail / Office, Garland, Texas – 9,000 sq. ft. retail / office using CMU load bearing masonry, steel joist, and concrete slab on grade – Architectural Design, Production, and Management, Structural engineering Design, Production, and Mgmt. - \$800,000 construction cost.
- 1999 Walgreen's Retail Store, Plano, Texas – 14,000 sq. ft. retail store with all amenities – steel framing, tilt up walls – Structural Engineering Design, Project Management - \$1,200,000 construction cost.

Entertainment Design:

- 2006 Paciugo Ice Cream, Frisco, Texas – 4,000 sq. ft. interior finish out of shell structure, dining, kitchen, rest rooms, and other amenities – Architectural Design, Documentation, Project Management - \$400,000 construction cost.
- 2004 Rick's Kicks Martial Arts Studio, Frisco, Texas – 5,000 sq. ft. martial arts studios, office, video room, and other amenities – stone / brick veneer, wood frame, steel support, wood lateral resistance, concrete foundation - Architectural Design, Production, and Management, Structural engineering Design, Production, and Mgmt. - \$550,000 construction cost.
- 1993 The Ballpark in Arlington, Arlington, Texas – \$191 million structure, steel framed, masonry veneer, concrete foundation – Architectural Construction Administration, Structural Engineering revisions during construction.

Governmental Design:

- 2010 Red River Army Blast Booth, Texarkana, Texas – 10,000 sq. ft. blast booth for equipment repair and cleaning – Structural Engineering Design and documentation - \$800,000 construction cost.

Municipal Design:

- 2010 City of Richardson Fire Station, Richardson, Texas – 2,500 sq. ft. metal storage building addition to existing fire station – Architectural Design, , Construction Administration, Structural Engineering Design and Documentation - \$75,000 construction cost.
- 2001 Southern Hunt County Community Center, Quinlan, Texas – 9,800 sq. ft. steel framed, masonry exterior - gymnasium, recreation areas, kitchen, and offices – Architectural Design, Production and Management - \$880,000 construction cost.

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1999 Richardson Senior Citizens Center, Richardson, Texas – 3,000 sq. ft. addition, 12,000 sq. ft. interior remodel and finish out – Architectural Design, Management and Construction Administration - \$900,000 construction cost.

LEED Projects (In Progress):

Green Projects:

2008 Fort Hood Family Housing, Fort Hood, Texas – 8,000 sq. ft. Community Center - single story LEED Silver – Structural Engineering Design, Production, Construction Administration, LEED Consulting - \$1,500,000 estimated construction cost.

2006 McKinney Aero County Airport, McKinney, Texas – 6,300 sq. ft. interior finish out / remodel of existing county airport into weekend residence / office – Architectural Design, Production, Construction Administration, Various Structural Engineering Design and Documentation - \$530,000 construction cost.

2006 Colorado Blvd. Residence Remodel / Addition, Dallas, Texas – 5,000 sq. ft. remodel and addition – wood framed, concrete/brick foundation early 1900's residence design by renowned Louisiana architect – Architectural Design, Structural Engineering Design, Documentation, and Management – \$630,000 construction cost.

2002 Cristina's Flowers, Plano, Texas – existing home addition / conversion to 10,000 sq. ft. flower distribution and retail – Architectural Design, Production and Construction Administration - \$600,000 construction cost.

Restaurant Design:

2007 Pizza Hut - Frisco Soccer & Entertainment Complex, Frisco, Texas – 6,500 sq.ft. dining, kitchen, rest rooms, and other amenities – Project Management, Structural Engineering Design - \$550,000 construction cost.

2003 Cheddars Restaurant, Arlington, Texas – 11,500 sq. ft. dining, kitchen, office, rest rooms, and other amenities – steel framing, load bearing CMU, spread and continuous footings, stone veneer - Project Management, Structural Engineering Design - \$1.0 million construction cost.

BR ARCHITECTS, Inc.

2007 N. Collins Blvd., Suite 507 • Richardson, Texas 75080 • P (972) 235-9308 • F (972) 235-9388

Project Resume
Bradford Russell, AIA, P.E.
BR Architects, Inc.
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Page 7 of 9

1999 Chuckie Cheese Restaurant, Burnsville, Arizona – 11,000 sq. ft. dining, kitchen, office, rest rooms, and other amenities – Project Management, Structural Engineering Design - \$1.0 million construction cost.

Multi-family Design / Management:

2007 TownParc Apartment Complex, Amarillo, Texas – 150 units, 270,000 sq. ft. apartment complex – Structural Construction Management / Observation - \$20 million construction cost.

2007 CityParc at Golden Triangle, Fort Worth, Texas – 312 units, 370,000 sq. ft. apartment complex – Structural Construction Management / Observation - \$30 million construction cost.

1997 Arbors of Denton Apartment Complex, Denton, Texas – 244 units, 180,000 sq. ft. apartment complex – Architectural Design, Production and Management - \$9.8 million construction cost.

1996 Hobby House Apartment Complex, Austin, Texas – 200+ units apartment complex – Architectural Design, Production and Management - \$8 million construction cost.

Religious Design:

2000 Crosspoint Church, McKinney, Texas – 20,405 sq. ft. worship center - classroom space, kitchen, and support spaces with phased master plan – Architectural Design and Construction Administration - \$2.5 million construction cost.

2000 Christ United Methodist Church, Plano, Texas – 30,411 sq. ft. classroom education building with support spaces – Architectural Design and Construction Administration - \$3.3 million construction cost.

2010 Trinity Presbyterian Church, Plano, Texas – wind storm damage / steeple replacement – Architectural Design, Construction Administration, and Structural Engineering - \$50,000 construction cost.

Educational Design:

2003 K. B. Polk Elementary School, Dallas, Texas – 35,000 sq. ft. classroom / office addition - concrete and masonry construction, steel frame roof, Architectural Design - \$3.5 million construction cost.

1998 Brownsville High School, Brownsville, Texas – 70,000 sq. ft. education building - steel frame, CMU non-load bearing walls, concrete foundation – Structural Engineering Design - \$6 million construction cost.

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Project Resume
Bradford Russell, AIA, P.E.
BR Architects, Inc.
December 2013
Page 8 of 9

Medical Design:

- 2006 Healthy Paws Veterinary Center, Little Elm, Texas – 1,600 sq. ft. veterinary exam rooms and offices to an existing 4,500 sq. ft. veterinary exam room building, wood frame structure – Architectural Design, Documentation, Structural Engineering Design, Documentation, Construction Administration - \$250,000 Construction Cost.
- 1997 Auburn Medical Office Building, Auburn, Washington – 70,000 sq. ft. office building for physicians, reinforced concrete and CMU structure – Structural Engineering Design - \$10.5 million construction cost.
- 1997 Bristol Regional Medical Center, Bristol, TN – 100,000 sq. ft. medical facility remodel, addition – Architect, Construction Administrator - \$9.8 million construction cost.

Interior Remodel / Design:

- 2010 Greenfield Foose office remodel, Dallas, Texas – 25,000 sq. ft. building foot print with 6,000 sq. ft. 2nd floor interior remodel of existing metal building space into office space - Architectural Design, Production, and various Structural Engineering - \$1,300,000 estimated construction cost.
- 2007 RoughRiders Merchandise Pavilion, Frisco, Texas – 4,000 sq. ft. interior finish out of existing space into retail space - Architectural Design, Production, and Construction Administration - \$340,000 construction cost.
- 2002 The Centre for Dance, Richardson, Texas – 10,000 sq. ft. interior finish-out of existing office space into dance studio, offices, kitchen, restrooms - Architectural Design, Production and Construction Administration - \$300,000 construction cost.
- 2000 Randstad North America, Farmers Branch, Texas – 4,200 sq. ft. offices, restrooms, conference rooms, interior finish out – Architectural Design and Construction Administration - \$180,000 construction cost.

Exterior Remodel / Design:

- 2007 Galleria North, Dallas, Texas – 70,000 sq. ft. floor area exterior veneer redesign – Architectural Design - \$1.5 million construction cost.

Various Unique Architectural & Structural Design:

- 2007 Routh Street Wine Cellar, Dallas, Texas – 450 sq. ft. underground wine cellar – Structural Engineering Design, Documentation, and Management - \$100,000 construction cost.

BR ARCHITECTS, Inc.

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Project Resume
Bradford Russell, AIA, P.E.
BR Architects, Inc.
December 2013
Page 9 of 9

- 2006 Watermark Land Development, Wylie, Texas – 500 ft. – Entry water Feature - Structural Engineering Design, Documentation, and Management - \$800,000 construction cost.
- 2006 Hilton Tulsa Southern Hills, Tulsa, Oklahoma – 2,500 sq. ft. – pool enclosure addition to existing concrete structural frame - Structural Engineering Verification, Design and Management - \$100,000 construction cost.
- 2006 Residential Exercise Pavilion Saudi Arabian Prince, Dallas, Texas – 500 sq. ft. addition – wood framed structure over concrete foundation built into hillside – Architectural Design, Structural Engineering Design, Documentation, and Management – \$130,000 construction cost.

BR ARCHITECTS, Inc.

2007 N. Collins Blvd., Suite 507 • Richardson, Texas 75080 • P (972) 235-9308 • F (972) 235-9388

Documents Reviewed by Experts

1. ERO
ERO Assessment Contract:
March 30, 2008
ERO Assessment Report, 2008 (and attachments from sub-consultants);
ERO – PSJA Architect Contract
Architectural Plans & Specifications
Project Manual
2. Frank Lam & Associates
September 30, 2009 Report
Structural Plans
October 18, Report
3. Descon
Descon – PSJA Construction Contracts
Phase I
Phase II
Change Orders/Change Directives
Phase I
Phase II
4. PSJA
Minutes of Board Meetings
Photographs
Plaintiff's Amended Petition
5. Third Parties
Rimkus Report of Structural Collapse
January 21, 2011
March 8, 2011

Delta Structural Technology Inc. Report
Column Repair and Strengthen

October 26, 2010

Garner Consulting Group

Site Visit Report

March 28, 2011

Raba Kistner Consultants, Inc.

Geotechnical Report

Aguirre & Patterson, Inc.

Irene B. Thompson

Appraisal Report (Stambaugh and Textbook Bldgs)

IN THE DISTRICT COURT
HIDALGO COUNTY, TEXAS
389th JUDICIAL DISTRICT

Page 1 of 2

CERTIFICATE OF SERVICE

I, ROBERT SCHELL, certify that on the 12th day of June, 2015, a true and correct copy of the foregoing Plaintiff Pharr San Juan Alamo Independent School District's Written Certificate of Discovery was served via certified U.S. Mail, return receipt requested and via Email on the following counsel of record:

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7784

And Email: sedwards@hudgins-law.com

Spencer Edwards
THE HUDGINS LAW FIRM
A PROFESSIONAL CORPORATION
24 Greenway Plaza, Suite 2000
Houston, Texas 77046

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7791

and Email: dbenjamin@benlawsa.com

David P. Benjamin
BENJAMIN, VANA, MARTINEZ & BIGGS, LLP
2161 NW Military Highway, Suite 111
San Antonio, Texas 78213

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7807

And Email: mbc@aaplalaw.com

Matthew B. Cano
Sara Whittington May
ALLENSWORTH AND PORTER, L.L.P.
100 Congress Avenue, Suite 700
Austin, Texas 78701



ROBERT SCHELL

CAUSE NO. C-5149-14-H

PHARR SAN JUAN ALAMO
INDEPENDENT SCHOOL DISTRICT
Plaintiff

vs.

TEXAS DESCON, L.P., DESCON 4S,
L.L.C. and ERO INTERNATIONAL,
L.L.P. d/b/a ERO ARCHITECTS
Defendants§ IN THE DISTRICT COURT
§
§
§
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§
§ HIDALGO COUNTY, TEXAS
§
§
§ 389th JUDICIAL DISTRICT**PLAINTIFF PHARR SAN JUAN ALAMO INDEPENDENT SCHOOL DISTRICT'S
CERTIFICATE OF WRITTEN DISCOVERY**

I certify that on the 12th day of June, 2015, I served the following discovery instruments on opposing counsel of record by via certified mail, return receipt requested, pursuant to the Texas Rules of Civil Procedure:

**PLAINTIFF PHARR SAN JUAN ALAMO INDEPENDENT SCHOOL DISTRICT'S
COMBINED FIRST SET OF INTERROGATORIES, FIRST REQUEST FOR
PRODUCTION, AND FIRST REQUEST FOR ADMISSIONS TO FRANK LAM &
ASSOCIATES, INC.**

Respectfully submitted,

THE J. RAMIREZ LAW FIRMAttorneys at Law
Ebony Park, Suite B
700 North Veterans Boulevard
San Juan, Texas 78589
Phone: (956) 502-5424
Fax: (956) 502-5007By: JESUS RAMIREZ
SBN 16501950
ROBERT SCHELL
SBN 24007992ATTORNEYS FOR PLAINTIFF
PHARR SAN JUAN ALAMO
INDEPENDENT SCHOOL DISTRICT

CERTIFICATE OF SERVICE

I, ROBERT SCHELL, certify that on the 12th day of June, 2015, a true and correct copy of the foregoing Plaintiff Pharr San Juan Alamo Independent School District's Written Certificate of Discovery was served via certified U.S. Mail, return receipt requested and via Email on the following counsel of record:

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7753

and Email: mbc@aaplax.com

Matthew B. Cano
ALLENSWORTH AND PORTER, L.L.P.
100 Congress Avenue, Suite 700
Austin, Texas 78701

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7760

and Email: sedwards@hudgets-law.com

Spencer Edwards
THE HUDGINS LAW FIRM
A PROFESSIONAL CORPORATION
24 Greenway Plaza, Suite 2000
Houston, Texas 77046

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7777

and Email: dbenjamin@benlawsa.com

David P. Benjamin
BENJAMIN, VANA, MARTINEZ & BIGGS, LLP
2161 NW Military Highway, Suite 111
San Antonio, Texas 78213


ROBERT SCHELL

CERTIFICATE OF SERVICE

I, ROBERT SCHELL, certify that on the 11th day of June, 2015, a true and correct copy of the foregoing Plaintiff Pharr San Juan Alamo Independent School District's Written Certificate of Discovery was served via certified U.S. Mail, return receipt requested and via Email on the following counsel of record:

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7722

And Email: dbenjamin@benlawsa.com

David P. Benjamin
BENJAMIN, VANA, MARTINEZ & BIGGS, LLP
2161 NW Military Highway, Suite 111
San Antonio, Texas 78213

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7739

And Email: mbc@aaplav.com

Matthew B. Cano
Sara Whittington May
ALLENSWORTH AND PORTER, L.L.P.
100 Congress Avenue, Suite 700
Austin, Texas 78701

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7746

And Email: sedwards@hudgetins-law.com

Spencer Edwards
THE HUDGINS LAW FIRM
A PROFESSIONAL CORPORATION
24 Greenway Plaza, Suite 2000
Houston, Texas 77046



ROBERT SCHELL

CAUSE NO. C-5149-14-H

PHARR SAN JUAN ALAMO
INDEPENDENT SCHOOL DISTRICT
Plaintiff

vs.

TEXAS DESCON, L.P., DESCON 4S,
L.L.C. and ERO INTERNATIONAL,
L.L.P. d/b/a ERO ARCHITECTS
Defendants

IN THE DISTRICT COURT

389th JUDICIAL DISTRICT

HIDALGO COUNTY, TEXAS

PLAINTIFF'S FIRST AMENDED ORIGINAL PETITION

NOW COMES, Pharr San Juan Alamo Independent School District, Plaintiff herein, complaining of Texas Descon, L.P., Descon 4S, L.L.C. and ERO International, L.L.P., d/b/a ERO Architects, and would show the Court as follows:

I.

Plaintiff intends to conduct discovery under Level 2 pursuant to Texas Rules of Civil Procedure 190.2.

II.

Jurisdiction and Venue

Venue is proper in Hidalgo County, Texas, as all or a substantial part of the acts or omissions giving rise to this cause of action occurred there. Tex. Civ. Prac. & Rem. Code, Section 15.002(a)(1).

III.

Parties

Plaintiff is Pharr San Juan Alamo Independent School District, a public independent school district and a political subdivision, duly formed and existing under the laws of the State of Texas, based in Hidalgo County, Texas.

Defendant is Texas Descon, L.P., a business entity with its principal office located in McAllen, Hidalgo County, Texas. This party has been served and has filed an Answer.

Defendant is Descon 4S, L.L.C., a business entity with its principal office located in McAllen, Hidalgo County, Texas. This party has been served and has filed an Answer.

Defendant is ERO International, L.L.P. d/b/a ERO Architects, a business entity with its principal office located in McAllen, Texas. This party has been served and has filed an Answer.

Third Party Defendant is Frank Lam & Associates, Inc. has been served and has filed an Answer.

IV. Facts

On or about February, 2008, the governing board of Pharr San Juan Alamo Independent School District (hereinafter, "Plaintiff" or "the District") authorized a preliminary investigation and assessment into the feasibility of upgrading and/or renovating existing structures at the District's Memorial Middle School campus in Pharr, Texas. One of the buildings considered for renovations and/or upgrades was a three-story main building, constructed in 1915 or 1918 with subsequent remodeling and/or additions in 1976 and 1986. Other buildings considered for renovation included a building used for textbook storage and a building used as a band hall, both originally constructed sometime in the 1940's.

On or about February 22, 2008, a Houston-based firm of consulting engineers, Terracon, published its report of an on-site property condition assessment and inspection of the buildings considered for renovations/upgrades. Terracon's assessment was based upon visual inspection of the property, some construction drawings relating to alteration and remodeling projects, as well as interviews with the District's construction manager, Mr. Ray Sanchez and Mr. Eli Ochoa, P.E., A.I.A., an engineer working for Defendant ERO International, L.L.P., an architectural firm

(hereinafter, "Defendant" or "ERO"). The Terracon report concluded that the buildings were in "fair to poor condition" and recommended that a detailed investigation of the foundation and structural framing be conducted by a qualified structural engineer to ascertain the viability of future renovations of the buildings. The Terracon report further noted that during inspection they discovered water ponding in the basement floor.

On or about March 3, 2008, Defendant ERO completed its own inspection of the existing structures at Memorial Middle School. ERO's report of its inspection noted various problems with the existing structures and the site, including large amounts of standing water and needed repairs or upgrades to the roofing system and exterior walls. The report ultimately recommended that the District should replace the campus rather than proceed with renovations and upgrades, and cautioned that major transformations, such as an evisceration of interior components for structural repairs to the foundation, sub-flooring and walls would be necessary if the District proceeded with renovations.

Nevertheless, on the basis of subsequent representations from Defendant ERO that it would be safe, feasible and economically practicable to proceed, the governing board of the District authorized the renovation/upgrade project ("the Project"), to be completed in two phases. Phase I would be the upgrade/renovation and adaptive reuse of the three story main building ("Main Building") and Phase II would be the upgrade/renovation and adaptive reuse of the band hall (Stambaugh Building) and a building use for textbook storage ("textbook storage building").

Defendant Texas Descon, L.P. through its general partner Descon 4S, L.L.C. (collectively, the "Descon Defendants") executed a contract as the General Contractor on the Project on or about May 4, 2010. Defendant ERO executed a contract as the Architect on the Project, on or about May 26, 2010.

Phase I of the Project entailed demolition of certain outer columns and support structures in order to construct improvements to the Main Building. Specifically, these improvements would be structures that linked newer building wings to the Main Building. During the course of the demolition of the outer support structures, portions of the main school building not designated for demolition, including large parts of the east wall and second story floor, collapsed. As a result of the demolition process and the east wall collapse, portions of the west wall and support columns in the interior part of the building suffered structural damage requiring significant repairs.

Regarding Phase II of the Project, it was discovered in the course of construction of additions and renovations to the textbook storage building and Stambaugh Building that the walls and support systems would have to be entirely demolished and rebuilt for stability purposes, essentially requiring that the buildings be re-constructed from the foundation up.

Post-delivery of the Phase I Project to Plaintiff, the basement floor exhibited infiltration of water requiring changes to the initial specifications and a major overhaul to the flooring.

V.

Breach of Contract

Plaintiff realleges and incorporates each material allegation contained in Paragraphs I through IV of this Petition as if fully set forth herein. Defendants breached their respective construction project contracts with Plaintiff by failing to perform the work as contemplated, or performing the work in a sub-standard manner that caused damage to Plaintiff's property. The respective contracts were supported by consideration, were never repudiated by any party to them, and all conditions precedent to their enforcement have occurred. Plaintiff incurred damages from the respective breaches of contract by having to incur expenses to repair, redesign, and replace the damaged buildings. For these damages, Plaintiff seeks redress from this Court.

VI. Negligence

Plaintiff realleges and incorporates each material allegation contained in Paragraphs I through V of this Petition as if fully set forth herein. The Descon Defendants were negligent in the following ways: planning and/or execution of the demolition portion of Phase I of the Project, resulting in the toppling of large portions of the east wall and second story floor and subsidiary damage to the west wall and support columns, and failing to follow the specifications and product installation conditions for the basement floor. This negligence on the part of the Descon Defendants included, but was not limited to, failure to adequately inspect and test the structures and site beforehand and failure to use appropriate demolition means and methods.

Defendant ERO was negligent in one or more of the following ways: failing to undertake a more thorough investigation and determination of the structural integrity and conditions of the facilities; failure to advise Plaintiff during the design phases of Project of ERO's lack of sufficient information to design and specify the Project; and advising Plaintiff to proceed with bidding the Projects in spite of insufficient plans and specifications. Negligence on the part of Defendant ERO included, but was not limited to, failure to adequately inspect and test the structures, failure to require and review a submittal for proper demolition means and methods, and failure to design improvements/additions to the existing structures which would have been appropriate and feasible.

ERO's negligence in its advice to Plaintiff and its negligent design, combined with Descon's negligence, resulted in the toppling of large portions of the east wall and second story floor of the main classroom building, along with subsidiary damage to the west wall and interior support columns, moisture infiltration to the basement floor and the additional cost of completion of the textbook storage building and Stambaugh Building.

Third Party Defendant Frank Lam & Associates, Inc. was negligent in the preparation of its structural engineering report and evaluation of existing structures at the Project site, commissioned by Defendant ERO in order to determine issues related to the renovation of existing buildings and to provide recommendations for the structural systems for the Project's renovations, additions, and new construction.

Defendants collectively owed a duty of care to plan and perform the demolition in a manner that would not result in the destruction of the District's property that was not scheduled for demolition, and to recommend and design additions and renovations that were appropriate for existing structures at the Memorial Middle School campus. Defendants breached this duty, proximately causing damages to Plaintiff.

Plaintiff has suffered injury in that costs to clean up, redesign, and rebuild the structures were incurred. For these damages, Plaintiff seeks redress from this Court. The Certificate of Merit of Bradford Russell, AIA, Architect, detailing the specific acts of negligence of Defendant ERO, is attached herein as Exhibit "A," and incorporated for all purposes (Exhibits attached to Plaintiff's Original Petition and previously produced to Defendants).

VII. Negligent Misrepresentation

Plaintiff realleges and incorporates each material allegation contained in Paragraphs I through VI of this Petition as if fully set forth herein. Plaintiff brings this action for common law misrepresentation against Defendant ERO. Defendant ERO provided false information to Plaintiff in the course of Defendant's business. ERO failed to exercise reasonable care or competence in obtaining and communicating, and Plaintiff justifiably relied on, the information, with damages to Plaintiff proximately resulting from said reliance. Specifically, Defendant ERO represented to Plaintiff that the improvements in the form of renovations and additions that ERO

recommended and designed would be appropriate for the existing structures at the Memorial Middle School campus, and could be feasibly completed as planned without foreseeable damage to existing structures, and without necessitating demolition and rebuilding of portions of structures not designated for demolition/rebuilding.

Plaintiff justifiably relied upon the representations of ERO in making its decision to approve the improvements, based upon ERO's professional credentials, and thereby suffered damages when it was discovered that the improvements recommended and designed by Defendant ERO were not appropriate for the existing structures and could not be completed without excess destruction and rebuilding far beyond what was originally contemplated. The damages sought by Plaintiff as to the Main Building is the difference between the cost of repairs and the cost had ERO included the necessary changes and modifications in the first place. The damages sought by Plaintiff as to the Stambaugh Building and textbook storage building is the difference between the cost to rebuild/renovate those buildings and the cost to build two completely new structures, in addition to the currently appraised values of those two buildings, which Plaintiff would have continued to utilize for school purposes.

VIII. Gross Negligence

Plaintiff further alleges that the acts and omissions of Defendant ERO constituted gross negligence, in that these acts or omissions, when viewed objectively from ERO's standpoint at the time of the occurrence, involved an extreme degree of risk considering the probability and magnitude of potential harm to others, which ERO had actual subjective awareness of the degree of risk involved, but proceeded with conscious indifference to the rights, safety, and welfare of others. Pleading more specifically, Defendant ERO recommended and designed improvements in the form of renovations and additions to existing structures at the District's Memorial Middle

School campus when it had actual, subjective knowledge that no renovations or additions should be contemplated because of inherent problems with the structures, yet nevertheless proceeded to recommend and design these improvements with a conscious disregard of the possibility of catastrophic accidents causing extreme property damage and/or potential injury and loss of life.

IX. Limitations/Repose

Plaintiff, being a school district, alleges that none of the causes of action pled herein are barred by limitations by operation of Tex. Civ. Prac. & Rem. Code, § 16.061.

Further, Plaintiff alleges that the Statute of Repose found in Tex. Civ. Prac. & Rem. Code § 16.008 does not bar its claim against Defendant ERO, who designed or planned the improvements on the Project, as Plaintiff has filed suit within ten years of the beginning of the operation of the equipment at the Project site.

Further, Plaintiff alleges that the Statute of Repose found in Tex. Civ. Prac. & Rem. Code § 16.009 does not bar its claim against the Descon Defendants, who constructed or repaired improvements in the course of the Project, as Plaintiff filed suit within ten years of the substantial completion of the improvements (i.e., renovations and additions to the buildings in question).

X. Resulting Legal Damages

Plaintiff is entitled to the actual damages proximately resulting from the Defendants' actions and omissions. Plaintiff has sustained damages in excess of the minimal jurisdictional limits of this Court resulting from the Defendant's acts and/or omissions. Plaintiff is also entitled to recover exemplary damages pursuant to Chapter 41 of the Texas Civil Practice & Remedies Code for the actions of Defendant ERO which constitute gross negligence.

**XI.
JURY DEMAND**

Plaintiff demands a trial by jury and tenders the appropriate fee with this Petition.

**XII.
PRAYER**

WHEREFORE, Plaintiff requests that the Defendants be cited to appear and answer, and that on final hearing, Plaintiff recover from Defendants, jointly and severally:

1. Actual and consequential damages in an amount exceeding the minimum jurisdictional limits of this Court, plus accrued interest from the date on which the claim accrued to the date of judgment;
2. Exemplary damages;
3. Attorney's fees in a reasonable sum as the Court may award;
4. Costs of suit, and pre and post judgment interest;
5. In the event of an appeal to the court of appeals, additional reasonable attorney's fee; in the event of granting of writ to the Supreme Court, additional reasonable attorney's fees.
6. Such other and further relief to which Plaintiff may be justly entitled at law or in equity.

Respectfully Submitted,

THE J. RAMIREZ LAW FIRM
Attorneys at Law
Ebony Park, Suite B
700 North Veterans Boulevard
San Juan, Texas 78589
(956) 502-5424
(956) 502-5007

By: 

JESUS RAMIREZ

SBN 16501950

Email: ramirezbook@gmail.com

Attorney for Plaintiff

ROBERT SCHELL

SBN 24007992

Email: robert_schell@hotmail.com

ATTORNEYS FOR

PHARR SAN JUAN ALAMO I.S.D.

CERTIFICATE OF SERVICE

I, JESUS RAMIREZ, certify that on the 10th day of June, 2015, a true and correct copy of the foregoing, Plaintiff's First Amended Original Petition was served on the following counsel of record:

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7647

And Email: sedwards@hudgins-law.com

Spencer Edwards

THE HUDGINS LAW FIRM

A PROFESSIONAL CORPORATION

24 Greenway Plaza, Suite 2000

Houston, Texas 77046

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7654

And Email: dbenjamin@benlawsa.com

David P. Benjamin

BENJAMIN, VANA, MARTINEZ & BIGGS, LLP

2161 NW Military Highway, Suite 111

San Antonio, Texas 78213

Via Certified Mail,

Return Receipt Requested No. 7015 0640 0006 9943 7661

And Email: mbc@aaplalaw.com

Matthew B. Cano

ALLENSWORTH AND PORTER, L.L.P.

100 Congress Avenue, Suite 700

Austin, Texas 78701



JESUS RAMIREZ

EXHIBIT "A"
TO
PLAINTIFF'S FIRST AMENDED ORIGINAL PETITION

C-5149-14-H

CAUSE NO. _____

PHARR SAN JUAN ALAMO
INDEPENDENT SCHOOL DISTRICT
Plaintiff

VS.

TEXAS DESCON, L.P., DESCON 4S,
L.L.C. and ERO INTERNATIONAL,
L.L.P. d/b/a ERO ARCHITECTS
Defendants

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IN THE DISTRICT COURT

HIDALGO COUNTY, TEXAS

389TH JUDICIAL DISTRICT

AFFIDAVIT OF BRADFORD RUSSELL, A.I.A., P.E.

THE STATE OF TEXAS

COUNTY OF HIDALGO

§
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§

BEFORE ME, the undersigned authority, on this day personally appeared **Bradford Russell, A.I.A., P.E.**, who being by me duly sworn on oath deposed and said:

1. "My name is **Bradford Russell**. I am over the age of twenty-one (21) years, I have never been convicted of a felony, and I am competent to make this affidavit. I have personal knowledge of the matters contained in this affidavit, and they are true and correct.
2. This affidavit is submitted pursuant to the requirements of TEXAS CIVIL PRACTICE AND REMEDIES CODE § 150.002, with respect to the architectural services provided by **Mr. Eli Ochoa, A.I.A., P.E. and ERO International, L.L.P. d/b/a ERO Architects** in the design and planning of improvements at Pharr San Juan Alamo Independent School District's Memorial Middle School in Pharr, Texas (the "**Project**").
3. I am a licensed professional architect and structural engineer in the state of Texas, I am competent to testify, and I am actively engaged in the practices of architecture and engineering. A true and correct copy of my resume is attached hereto as Exhibit A, and is incorporated herein by reference for all purposes.
4. Based on my research, experience in the industry, and review of Project Documents, as described herein below, **Mr. Eli Ochoa, A.I.A., P.E. and ERO International, L.L.P. d/b/a ERO Architects** were engaged in, and were retained on the Project, to plan and design improvements, including renovations and additions to existing structures and all architectural requirements in connection therewith.

C-5149-14-H

5. As shown in my resume, Exhibit A, I am licensed to practice architecture, and have, for the past 15 plus years, been actively engaged in providing architectural services for clients similar in nature and geographic location to the Project.

6. Based on my education and professional experience, I have personal knowledge of the acceptable standards for the practice of architecture and the plan and design of improvements including renovations and additions to older structures and all architectural requirements in connection therewith, in the state of Texas and the greater McAllen area, which was the task to be performed by **Mr. Eli Ochoa, A.I.A., P.E. and ERO International, L.L.P. d/b/a ERO Architects** on this Project.

7. I have reviewed the following documents (the "Project Documents" herein) relating to the Project and **Mr. Eli Ochoa, A.I.A., P.E. and ERO International, L.L.P. d/b/a ERO Architects'** services in this matter:

See Exhibit B: Project Documents

8. Based on my education, experience, and a review of the Project Documents, it is my professional opinion that **Mr. Eli Ochoa, A.I.A., P.E. and ERO International, L.L.P. d/b/a ERO Architects** is responsible for at least the following act, error, or omission that exists on the Project:

- 1) **Failing to undertake a more thorough investigation and determination of the structural integrity of an existing building for future modifications, and existing conditions of the facilities,**
- 2) **Failure to advise Plaintiff during the design phases of Project of ERO's lack of sufficient information to design and specify the Project without a degree of uncertainty,**
- 3) **Failure to require and review a submittal for proper demolition of Project from the contractor for the construction,**
- 4) **Failure to design improvements/additions to the existing structures which would have been appropriate for structures of similar age and condition.**

9. These acts, errors, and/or omissions show that **Mr. Eli Ochoa, A.I.A., P.E. and ERO International, L.L.P. d/b/a ERO Architects** failed to meet the applicable work product standards of similar design professionals.

10. My investigation is ongoing, and further examination of the Project may lead to a different understanding or to the discovery of additional negligent acts, errors, and/or omissions in the work performed by **Mr. Eli Ochoa, A.I.A., P.E. and ERO International, L.L.P. d/b/a ERO Architects**. As a result, I reserve the right to supplement and/or expand my opinions and conclusions with respect to the performance of **Mr. Eli Ochoa, A.I.A., P.E. and ERO International, L.L.P. d/b/a ERO Architects**.

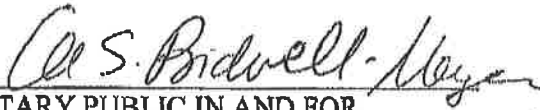
C-5149-14-H

Further affiant sayeth naught.



BRADFORD RUSSELL, A.I.A., P.E.

SUBSCRIBED AND SWORN TO before me by the said Bradford Russell on this the
9th day of May, 2014 to certify which witness my hand and seal of office.



NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

My Commission Expires:

11-19-2017



CAUSE NO. C-5149-14-H

PHARR SAN JUAN ALAMO
INDEPENDENT SCHOOL DISTRICT

VS.

TEXAS DESCON, LP, DESCON 4S, LLC
AND ERO INTERNATIONAL, LLP D/B/A
ERO ARCHITECTS

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IN THE DISTRICT COURT OF

HIDALGO COUNTY, TEXAS

389TH JUDICIAL DISTRICT

THIRD PARTY PLAINTIFFS' NOTICE OF NONSUIT

Third-Party Plaintiffs Texas Descon, LP and Descon 4S, LLC hereby nonsuit all claims asserted against Third-Party Defendant VCI Builders, Inc. without prejudice to their right to refile at a later date.

Respectfully submitted,



By:

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**ATTORNEYS FOR DEFENDANTS/
THIRD PARTY PLAINTIFFS
TEXAS DESCON, LP AND DESCON 4S, LLC**

CERTIFICATE OF SERVICE

I certify that the foregoing *Notice of Nonsuit without Prejudice* was served on the following counsel:

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via e-filing and facsimile on the 3rd day of June 2015.



Eric C. Nordstrom